

STAFF'S REVISED ISSUES AND QUESTIONS LIST

1.1.2.B “All preordering, ordering, provisioning, maintenance and billing requests will be handled through the Telephone company’s electronic interfaces.”

The same requirement appears at 5.1.4.A and 12.2.1.B. Why can’t CLECs file requests via fax or telephone? Has there been a change in policy?

2.1.1.A.1 “The Telephone Company does not offer unbundled SONET rings.”

Does VZ provide service on SONET rings to its retail customers? If so, explain why this provision does not conflict with the non-discriminatory requirement of the Act.

2.1.1.A.3 “A TC’s collocation arrangement must be equipped to handle the level of dedicated IOF transport being requested. If the collocation site is not so equipped, the TC must augment such arrangement with the proper cross connects before the TC submits its request for unbundled dedicated IOF transport.”

Please explain why the requests cannot be submitted simultaneously.

2.2.1.A “Channel mileage provides for the transmission facility between the two termination points, (either the TC central office designated by the TC or the collocation node established within a Telephone Company central office).”

Is this air mileage? If so, the tariff state should reflect that fact.

2.1.1.A.4 “The Telephone Company is not required to construct new IOF transport facilities to meet specific TC point-to-point demand for facilities that the Telephone Company has not deployed for its own use.”

Are CLECs required to submit forecasts relating to this element? If so, why?

4.1.1.A.1.a “The UNE dedicated tandem trunk port cannot be ordered as a separate element. This port is provided to a TC with its request for UNE message trunks at a Telephone Company tandem switch.”

Please explain why this element cannot be ordered alone.

5.1.4.B “A change from one TC to another is considered a disconnect of the two-wire link from the original TC and a connect of a two-wire link with the new TC.”

This may be just a change in the billing record. If so, shouldn't different charges apply than when a physical disconnection is required? Or, does Verizon believe that there will always be a need to remove one set of jumpers and install a new set? (The same term appears elsewhere in §5 of the tariff. Also at 12.1.5.A, 12.2.4.A.)

5.1.4.C “A conversion from a two-wire link to full service will be considered a disconnect from a TC and a connect to a Telephone Company end user.”

What is “full service”? (This same issue comes up in several other places.)

5.1.5.B “If a TC requests information pertaining to the technical parameters of the loop facility (i.e., copper or pair gain, or copper loop resistance expressed in ranges), a nonrecurring loop information request charge will apply.”

Does this refer to the engineering query rate element?

5.3.2 “It is the responsibility of the TC (or any other party of interest, such as the applicant for service, the owner or operator of the premises or the builder) to provide in a manner satisfactory to the Telephone Company, and without cost to the Telephone Company, a means of entrance for the fiber optic cable into the building; space for mounting the necessary terminals and equipment; power necessary for the terminals and equipment; and where required, a means to reach each floor and each suite or office on each floor where telephone service is required.”

Is this arrangement symmetrical? If not, why not?

5.4.2.A “The TC must specify, through appropriate NC/NCI codes, the xDSL technology to be provided over the DSL loop to allow the Telephone Company to identify and manage various advanced services technologies and spectrum management issues within binder groups.

Please explain why Verizon needs this information.

5.4.2.B.1 Loop qualification database.

- a. Are all loops in all rate centers in Maine included in the loop qualification database? If not, please describe which ones are included.

- b. Explain what information or data was used to populate the database. What Verizon records were used? What physical tests were done? What field work was done?
- c. If the database is populated with data not specifically designed for a loop qualification database, please explain the purpose for which the underlying data was originally gathered. Include in that description all specific parameters used in the original gathering.
- d. Explain the basis for requiring all xDSL lines to pay a monthly loop qualification charge in the particular line was not included in the loop qualification database and the CLEC paid the manual loop qualification charge.
- e. For the last six months for Maine, provide the following data:
 - i. total number of dips into the loop qualification database;
 - ii. number of dips into the loop qualification database by Verizon;
 - iii. total number of times the database incorrectly indicated a line was not qualified;
 - iv. number of times the database incorrectly indicated a line was not qualified when Verizon queried the database on behalf of a Verizon customer;
 - v. total number of times the database incorrectly indicated a line was qualified;
 - vi. number of times the database incorrectly indicated a line was qualified when Verizon queried the database on behalf of a Verizon customer;
 - vii. total number of requests (on both pre-order and order bases) for manual loop qualification;
 - viii. number of requests by Verizon (on both pre-order and order bases) for manual loop qualification;
 - ix. number of requests by CLECs (on both pre-order and order bases) for manual loop qualification;

- x, total number of requests for engineering queries for further information;
 - xi. number of requests for engineering queries by Verizon for further information;
 - xii. number of requests for engineering queries by CLECs for further information;
- f. The total amount of charges for manual loop qualification requests since 1996.
- g. The total amount of charges for the loop qualification database, including those paid pursuant to interconnection agreements.
- h. Describe any ongoing work on the loop qualification database, identify all persons (by position) doing such work, and quantify the total manhours of work done per week on the database.
- i. Provide the customer service scripts used for handling calls by customers who want to order xDSL services from Verizon.
- j. Describe what actions are taken if a Verizon retail customer requests xDSL services in a DSL-qualified central office and the loop qualification database indicates the line does not qualify.
- k. Does Verizon Maine, or any xDSL affiliate, use the Celerity system from Teradyne for its qualification queries?
- l. Explain how charging CLECs a loop qualification charge is consistent with the Commission's finding in 97-505 that the fiber feeder breakpoint is 9,000 feet.
- m. Explain why providing CLECs with access to the loop qualification database is consistent with the FCC's requirement that CLECs be given access to the same information available to the ILEC if additional information is available to the ILEC, i.e., the information available through a manual loop qualification and/or engineering query.

5.4.2.B.3 "Engineering Query— The TC may request information about a link from Telephone Company records beyond that supplied by the mechanized prequalification database or by manual loop qualification. Information such as length, number and location of bridged taps, number and location of

load coils, location of digital loop carrier, or cable gauge at specific locations from Telephone Company cable records may be requested.”

5.4.2.B.1 says that length is already included in the mechanized pre-qualification database. If this is the case, why would a CLEC make an engineering query for datum on the loop length?

- 6.1.1.1.a “Analog line ports can be interconnected to a collocation arrangement in the Telephone Company's central office and are subject to service access charges.”

What are service access charges? Is the word access used in the same sense as it is used in the phrase access to an interexchange carrier?

- 6.1.1.D “Since the Telephone Company is recovering its costs for terminating usage to an unbundled line port through charges to the originating party, for calls that originate on the Telephone Company network the terminating TC will incur no additional costs for the transport and termination of calls to such line ports and will not be eligible for reciprocal compensation from the Telephone Company for such calls.”

Please explain.

- 6.1.1.3.b “Telephone numbers will be assigned at the customer's request to primary ISDN ports in sequential blocks of 20 or 100 numbers.”

Why not 24 numbers since primary rate ISDN provides 24 DS0 links?

- 6.1.2 This section relates to AIN triggers.

Are there any problems with the conditions set forth in this section and the use of soft switches? Please explain the basis for the limitation in availability. Finally, the pricing appears to be different than the TELRIC Order pricing.

- 6.1.6.D “When the TC requests the suspension or restoral of a line port, a feature charge applies.”

The term feature charge does not appear in 6.1.6.a. Shouldn't the term service order be substituted for feature charge (6.1.6.B.1)? Similarly, what is meant by a feature charge: “When the TC requests the suspension or restoral of a line port, a feature charge applies.” 6.1.6.D

- 6.1.6.E. “Nonrecurring feature charges apply per port, per feature for call forwarding busy, call forwarding don't answer, call waiting, centrex intercom dialing, customer ringing, speed calling and three way calling.”

Will there be a separate charge for each feature ordered? If so, please show how this rate proposal is consistent with the Company's NRC cost study.

6.1.6.H The NDR will be billed according to the amount of time used to develop the NDR plan and install the necessary routings and line class codes. The amount of time billed will only include time spent by Telephone Company personnel directly involved in the defining, building and installing line class codes and dedicated trunk groups.

There does not appear to be a TELRIC rate for network design. Is there a cost study to support this charge?

6.1.6.I Line Port Traffic Studies

How often are traffic studies done? Which party controls when and if a study occurs.

6.1.6.J "A conversion from a coin full service to a coin port service will be considered a disconnect from the full service and new connect for the port service. A conversion from a coin port service to a full coin service will be considered a disconnect from the port service and a new connect for the full coin service. Service charges and NRCs apply for the individual services."

Please explain the basis for treating conversions as disconnects.

6.1.6.K.1 "Where the AIN query originates from a TC's signaling point of interconnection, a per message rate adjustment will apply to account for any SS7 signaling resources that are utilized that may have been previously purchased by the TC on a dedicated basis."

Please explain what is meant by "previously purchased on a dedicated basis" and what the basis for any change is?

6.2.1.A.2 "1.544 Mbps bandwidth capable of supporting twenty-four 56 kbps trunks."

Why not 64 kpbs since $24 * 56 = 1.344$ Mbps?

6.3 Switching usage.

Please provide support for changing the TELRIC -approved, time-of-day sensitive rates to blended all-day rates.

Please provide support for Verizon's position that both originating and terminating charges should apply on an intra-switch phone call. Please specifically address whether the FCC's DEM data accounts for intra-switch calls.

12.2.1.A. 2 "House and riser cable does not provide a TC with access to Telephone Company smart jacks."

What is a smart jack?

12.2.1.C.3 "When a TC requests the Telephone Company to provide a terminal block, but it cannot be located within cross connect distance to the network side of the Telephone Company's house and riser facilities because suitable space and facilities do not exist, the Telephone Company will provide 50 feet of cable and a compatible fifty pair terminal block adjacent to the TC's connection block."

What occurs when more than 50 terminations are required?

12.2.2.D "The Telephone Company reserves the right to refuse access to its house and riser cable when a TC has significantly increased the number of out of service conditions in a building."

What criteria will Verizon use to determine that the TC "has significantly increased the number of out of service conditions in a building"?

13 EELs.

Please provide the citation for the FCC order that is the basis for the "FCC approved" language found in this section.

13.3.1.D "To ensure adequate infrastructure planning to meet customer service requirements within standard intervals, TCs must provide the Telephone Company with at least a one year detailed forecast of its volume requirement for all EEL arrangements. This should include requirements for both new growth and change in volumes. The forecast is to be provided to the Telephone Company on an annual basis."

In section 18.1.2.B.1 the TC is also required to provide a forecast to Verizon. What happens if something is ordered that does not comply with

the forecast? Also, if there is no requirement on the part of Verizon to build out for CLECs, why do CLECs have to submit forecasts?

- 15.2.2 “A TC purchasing a UNE–P combination is responsible for testing, trouble isolation, and requesting dispatch of a Telephone Company technician for repair, using the mechanized trouble reporting system provided by the Telephone Company.”

If Verizon is providing the network, how will the TC conduct the testing and trouble isolation?

- 18.1.2.B.2 Is there a TELRIC rate for FDI Serving Address Inquiry? If not, is there a cost study providing the basis for the rate filed in this proceeding?

- 18.1.2.C “Upon receipt of a completed application, the application fee and any applicable inquiry and review fees, the Telephone Company will proceed with the site survey, design the required work order and prepare a cost estimate for completion of the required work. The Telephone Company will provide the TC with the work order and cost estimate for the Telephone Company effort necessary to support the establishment of the network interconnect arrangement within 45 business days after receipt of the application.”

Was this cost addressed in the NRC sub-loop unbundling NRC studies? Also, what is the basis for the 45-day interval for providing a CLEC with an estimate?

- 18.1.2.E.2 “The TC will report the intended use of the sub-loop (i.e., voice, ADSL, 2-wire HDSL or 4-wire HDSL) and request any conditioning (i.e., removal of bridge tap or load coils) at the time of order.”

Why does the TC need to report the intended use?

- 19.1.1. “A TC may request a line sharing arrangement for nondiscriminatory access to the high frequency portion of an existing copper loop for its own use. The Telephone Company provides and continues to provide analog circuit-switched voice grade services over the same copper loop.”

As drafted, the language only provides for line sharing on “existing copper loop.” Does that imply that Verizon will not provide line sharing on any copper loops installed subsequent to the effective date of the tariff? Also, under certain conditions set forth by the FCC, Verizon has to provide line sharing on fiber fed loops.

- 19.1.2.C.4.a “Binder groups are copper pairs bundled together, generally in groups of 25, 50 or 100.”

Explain why groups of 50 or 100 are considered binder groups. (See also 22.1.2.C.4.a)

- 19.1.4.C “The TC must notify the Telephone Company's voice customer that a disruption of the customer's voice grade service may occur during the provisioning, trouble isolation or repair of the TC's advanced data service over a line sharing arrangement. The TC must obtain concurrence and acknowledgment from the customer.”

Is similar notification provided when Verizon is the provider of DSL service?

- 19.2.2.A “OSS Charges—Apply per line on a recurring monthly basis to recover enhancements to and maintenance of the Telephone Company's operating support system necessary to support line sharing.”

OSS charges for line sharing were not approved in the TELRIC proceeding. (See also 22.2.2)

- 22.1.1.D “The Telephone Company will facilitate the ability of a DLEC to add DSL to an existing UNE-P arrangement. The addition of data will trigger the conversion of the UNE-P to a 2 wire line split loop (i.e., UNE ADSL compatible loop) and a UNE analog end office switch port.”

What about other elements included in UNE-P such as transport, SS7, etc?

- 22.2.3.A “Wideband Test Access Monthly Rate — Applies per line.”

Is this an optional charge? In the TELRIC case it appeared this charge was optional because it appears under the heading “line sharing optional wideband” in the excel rate sheet.

In addition to the above, Staff has the following questions concerning differences between the propose Maine tariff and the approved Massachusetts tariff.

1. What is the status of incorporating the Massachusetts' DTE's July 2002 and January 2003 Orders into the Massachusetts wholesale tariff?
2. Please explain the basis for the difference between PUC ME No. 20 6.2.1.A and DTE MA No. 17 6.2.1.A.
3. Please explain the basis for the difference between PUC ME No. 20 6.3.2.E.5 and DTE MA No. 17 6.3.2.E.5.

4. Please explain the basis for the difference between PUC ME No. 20 12.2 and DTE MA No. 17 12.2.
5. Please explain the basis for the difference between PUC ME No. 20 13.4.1.B and DTE MA No. 17 13.4.1.B.
6. Please explain the basis for the difference between PUC ME No. 20 13.5.1.B and DTE MA No. 17 13.5.1.B.
7. Please explain the basis for the difference between PUC ME No. 20 13.5.1.D and DTE MA No. 17 13.5.1.D.
8. Please explain why PUC ME No. 20 does not have equivalent sections to DTE MA No. 17 14.1.1.B.2 and 14.1.1.C.
9. Please explain the basis for the difference between PUC ME No. 20 14.2 and DTE MA No. 17 14.2.
10. Please explain why PUC ME No. 20 does not have an equivalent section to DTE MA No. 17 16.1.1.C.
11. Please explain the basis for the difference between PUC ME No. 20 18.1.1.A and DTE MA No. 17 18.1.1.A.
12. Please explain the basis for the difference between PUC ME No. 20 18.1.2.B and DTE MA No. 17 18.1.2.B.
13. Please explain the basis for the difference between PUC ME No. 20 18.1.3, 18.1.4, and 18.1.5 and DTE MA No. 17 18.1.3, 18.1.4, and 18.1.5 specifically include an explanation of the issues with respect to the differences between FDIs and cross connects.
14. Please explain the basis for the difference between PUC ME No. 20 19.1.1.B and DTE MA No. 17 19.1.1.B.
15. Please explain the basis for the difference between PUC ME No. 20 21.1.1.A and DTE MA No. 17 21.1.1.A.
16. Please explain the basis for the difference between PUC ME No. 20 21.1.1.B and DTE MA No. 17 21.1.1.B.
17. Please explain why DTE MA No. 17 does not have similar sections to PUC ME NO 20 21.1.2.B.2.a, 21.1.2.B.2.b, and 21.1.2.B.2.c.

